PART A OF THE SUPPORTING STATEMENT

1. Identification of the Information Collection

1(a) Title and Number of the Information Collection

"Reporting, Recordkeeping and Monitoring Requirements for the National Emission Standard for Hazardous Air Pollutants for Halogenated Solvent Cleaning Machines." The Environmental Protection Agency (EPA) tracking number for this ICR is 1652-04.

1(b) Short Characterization

(i) Applicability. Respondents are owners or operators of solvent cleaning machines using any solvent containing methylene chloride (MC), perchloroethylene (PCE)' 1, 1,1-trichloroethane (TCA), trichloroethylene (TCE), carbon tetrachloride (CT), chloroform (C), or any combination of these halogenated solvents in a concentration greater than 5 percent by-weight. This includes batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machines.

(ii) Batch vapor and in-line solvent cleaning machines. Owners or operators of a batch vapor or in-line cleaning machine subject to this regulation must choose between an equipment/work practice standard or a solvent emission limit standard in order to comply. All respondents must submit an initial report for applicability determination. All respondents must then submit an initial statement of compliance that delineates the compliance alternative chosen for each solvent cleaning machine and how the requirements are being met.

To comply with the regulation, respondents choose between an equipment/work practice option and an overall solvent emissions limit option for each solvent cleaning machine. To meet the equipment standards, respondents must either install and monitor specific control device combinations listed in the regulation, or they must monitor the idling emission control parameters that they have

established. If the respondents choose to install a control combination listed in the regulation, they must maintain quarterly, monthly or weekly control device monitoring records based on the type of control device installed as specified in the regulation, and installation dates of each cleaning machine and its control devices. The frequency of monitoring and recordkeeping of certain control device parameters is reduced if parameter compliance is consistent and increased when a parameter is exceeded.

Respondents choosing the idling emission option must perform an idling emission test on their solvent cleaning machines and monitor idling emission control parameters. Emission control parameters to be maintained and monitored must be established during the test. In most cases, this test will be completed by the manufacturer of the solvent cleaning machine. All respondents using idling emission parameter monitoring to demonstrate compliance must keep records of the monitoring results, test results (if an idling emission test was required), and installation dates or certification of each cleaning machine and its control devices.

If the respondents choose the overall solvent emissions limit option, they must maintain a log of the dates and amounts of solvent additions and deletions, and the solvent composition of wastes removed; calculate monthly emissions and rolling 3-month average emissions; and maintain the calculation sheets showing how the emissions were determined. These records~must be maintained for five years for each solvent cleaning machine.

All respondents must submit an annual report of monitoring or solvent emission results to the EPA. All respondents must submit a biannual exceedance report. If an exceedance occurs, exceedance reports must be submitted quarterly. The

circumstances under which an exceedance of a monitored control parameter occurs, under the equipment standard, are outlined in the regulation. Some exceedances occur when a monitored parameter does not meet specified requirements within 15 days of the initial occurrence of an exceedance of a specified requirement. Other exceedances occur immediately upon the exceedance of a specified requirement. An exceedance of the overall solvent emissions limit occurs at the time when the emission limit is not met.

(iii) Batch cold cleaning machines. owners or operators of a batch cold cleaning machine must comply with an equipment standard and work practices. All respondents must submit an initial notification report and an initial statement of compliance.

(iv) Record retention. Owners or operators of batch vapor and in-line cleaning machines must maintain all control device monitoring or solvent consumption records on- site for 5 years. Owners or operators of batch vapor and in- line cleaning machines must retain records of installation dates of each machine and related equipment, owner's manuals, and any test reports for the life of the machine. For existing cleaning machines for which an
operator or owner no longer has an owner's manual or any installation records, an owner or operator must provide and maintain certification that the machine and/or its controls were installed prior to the proposal date. Owners or operators of batch cold cleaning machines have no recordkeeping requirements. This information will be used by EPA to determine that all sources subject to these national emission standards for hazardous air pollutants (NESHAP) are achieving the standards.

(v) Need and use of data. Records and reports required by the

NESHAP for halogenated solvent cleaners are necessary to enable EPA to identify sources subject to the standards and to ensure that the standards are being achieved. Records and reports must be maintained at the facility and/or submitted to EPA. The submitted information will be maintained by EPA in a centralized location.

(vi) Cost for Data Collect. Owners or operators are required to comply with the NESHAP for halogenated solvent cleaners at the annual cost of $5,887,968.50.

2. Need for and Use of the Collection

2(a) Need/Authority of the Collection

The EPA is required under Section 112(d) of the 1990 Clean Air Act (Act), to regulate emissions of 189 hazardous air pollutants (HAP's) listed in Section 112(b) of the Act. The following six pollutants are covered under the halogenated solvent cleaner NESHAP: MC, PCE, TCA, TCE, CT, and C.

In the Administrator's judgement, the pollutants emitted from halogenated HAP solvent cleaning machines cause or contribute significantly to air pollution that may reasonably be anticipated to endanger public health. Implementation of the NESHAP for halogenated solvent cleaners will reduce the pollutants emitted to the air.

Certain records and reports are necessary to enable the Administrator to identify sources subject to the standard and to ensure that the standard, which is based on maximum achievable control technology (MACT) for batch vapor and in-line cleaning machines, and generally available control technology (GACT) for batch cold cleaning machines, is being achieved.

2(b) Practical Utility/Users Of The Data

The information is and/or will be used by Agency enforcement personnel to: (1) identify sources subject to the standard; (2) ensure that MACT and GACT are being properly applied; (3) ensure that solvent emissions are being measured or that monitoring is being conducted as specified in the regulation, as appropriate; (4) identify those facilities that should be inspected; (5) identify those facilities that may benefit from compliance assistance activities; and (6) to ensure that the emission control devices are being properly operated and maintained on a continuous basis to reduce HAP emissions.

The records and reports are necessary to enable the EPA to identify those facilities that may not be in compliance with the standard. Based on reported information, the EPA can decide whether a facility should be targeted for compliance assistance or
inspected and what records or processes should be inspected. The records that facilities maintain indicate to the EPA whether plant personnel are operating and maintaining control equipment properly.

To minimize the burden, much of the information the EPA needs to determine compliance will be recorded and retained on-site at the facility. Such information will be reviewed by enforcement personnel during an inspection and will not need to be routinely reported to the EPA. Minimal reporting is necessary unless a violation occurs.

Facilities subject to the NESHAP for halogenated solvent cleaners are not required to achieve compliance with all applicable provisions until December 1997. However, the regulating agencies have made use of the initial notification reports as required in §63.468(a) to identify sources for compliance assistance activities.

3. THE RESPONDENTS AND THE INFORMATION REQUESTED

3(a) Respondents/SIC Codes

The halogenated solvent cleaning machine source category does not constitute a distinct industry category, but is an integral part of many major and minor industries. The respondents are owners or operators of batch, vapor, or in-line (cold and vapor) solvent cleaning machines using any solvent containing MC, PCE, TCA, TCE, CT, C, or any combination of these halogenated solvents, in a total concentration greater than 5 percent by-weight. The largest quantities of halogenated solvents used for cleaning are in the following 2-digit SIC codes: SIC 25, furniture and fixtures; SIC 24, fabricated metal products; SIC 36, electric and electronic equipment; SIC 37, transportation equipment; and SIC 39, miscellaneous manufacturing. Additional industries that use halogenated solvents in cleaning-include the following: SIC 20, food and kindred products; SIC 33, primary metals; SIC 35, nonelectric machinery; and SIC 38, instruments and clocks. Nonmanufacturing industries such as railroad, bus, aircraft, and truck maintenance facilities; automotive and electric tool repair shops; automobile dealers; and service stations also use halogenated solvent cleaning machines.

3(b) Information Requested

(i) Data items. Attachment 1, Source Data Information

Requirements, summarizes the recordkeeping and reporting requirements.

(ii) Respondent activities. The respondent activities required by the standards are listed in the first column of Tables 2 and 3, which are presented in Section 6(a). The activities listed in Tables 2 and 3 are not considered "customary and usual business practice."

4. THE INFORMATION COLLECTED--AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

4(a) Agency Activities

Reporting and recordkeeping requirements on the part of respondents are required under section 112 of the Act. Recordkeeping is required to ensure that installation, monitoring and applicable results are documented and maintained. The reports are necessary to inform the regulatory agency that this rule applies to a machine and that the facility is complying with the rule. The reports that are specifically required by the rule are initial notification report, initial statement of compliance report, annual compliance report, exceedance report (required only when and exceedance occurs and equivalency determination report (required only if the facility wants to use different equipment or procedures other than those specified in the rule. Examination of records to be maintained by the respondents will occur incidentally as a part of the periodic inspection and compliance assistance outreach to sources that is part of the EPA's overall compliance and enforcement program and is not attributable to this ICR. A list of Agency activities is provided in Table 4 and is discussed in Section 6(c).

4(b) Collection Methodology and Management

This section is not relevant to this information collection request (ICR).

4(c) Small Entity Flexibility

This regulation does not have a significant impact on a substantial number of small business entities because solvent cleaning operations generally represent a small cost share of total production costs, and compliance cost increases would be less than 5 percent of the annual total production costs for small business entities. The alternatives included in the proposed regulation provide flexibility to accommodate small businesses.

4(d) Collection Schedule

For all existing sources, the initial notification report was required to be submitted within 9 months of promulgation of this standard. New sources for which construction or reconstruction had commenced and initial startup had not occurred before the date of promulgation of this standard were required submit the initial report as soon as practicable before startup but no later than 60 days after the date of promulgation of the standard. New sources for which the construction or reconstruction commenced after the date of promulgation of this standard must submit the initial notification as soon as practicable before the construction or reconstruction is planned to commence (but no sooner than the date of promulgation of the standard). Owners or operators of existing solvent cleaning machines must submit an initial compliance report within 150 days of the date of compliance (December 1997). Owners or operators of new cleaning machines must submit an initial

compliance report no later than 150 days after startup or 150 days from the date of promulgation, whichever is later. Thereafter, owners or operators of batch vapor and in-line cleaning machines must document compliance through reporting solvent consumption and emissions estimates, or maintaining monitoring records. Also, owners or operators of batch vapor and in-line cleaning machines must submit a biannual exceedance report, as discussed in Section 1(b)(ii).

5. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

5(a) Nonduplication

There is no duplication of the requested information. There are requirements for some facilities under the Superfund Amendments and Reauthorization Act (SARA, Title III) to track solvent consumption; however, they are required to keep data on a facility-wide basis as opposed to tracking solvent consumption for each solvent cleaning machine, and not all facilities that use solvent cleaning machines are required to report under SARA Title III.

5(b) Public Notice Required Prior to ICR Submission to OMB

A 60-day public comment period for the renewal of this ICR was announced in the Federal Register on August 17,2000 (65 FR 50196). No comments were received by EPA.

5(c) Consultations

The EPA consulted with several industry representatives to obtain information and/or comment on the burden estimates. Table 1 provides a list of industry representatives who were contacted for information. The industry representatives contacted concurred with the burden estimates provided in this ICR.

Table 1. Persons Contacted For Information Used to Develop the Information

Name	Affiliation	Phone Number
Lloyd B. Bryant	Allied Signal Aerospace	(410) 832-220
Edward Parker	Sonicor Instrument Corporation	(516) 842-3344
Alton D. Romig	Environmental Consultant	(610) 865-2284

5(d) Effects of Less Frequent Collection

If the relevant information were collected less frequently, the EPA would not be reasonably assured that an owner or operator of a regulated solvent cleaning machine is in compliance with the standards.

5(e) General Guidelines

The NESHAP for halogenated solvent cleaning machines requires that batch vapor and in-line solvent cleaning machine owners and operators retain records of control device monitoring or solvent emissions calculations records at facilities for a period of 5 years, which exceeds the 3-year retention period contained in the guidelines in 5 CFR 1320.6. Title V operating program permits are required for batch vapor and in-line cleaning machines. Nonmajor sources are exempt from permitting requirements for 5 years. The 5-year records retention time period is consistent with records retention requirements in the operating permit program under title V of the CAA, and the General Provisions (CFR Part 63, subpart A). Batch cold cleaning machines located at nonmajor sources are exempt from title V permit requirements.

The batch vapor and in-line cleaning machine owners and

operators are also required, for the lifetime of each machine and its control devices, to retain the owner's manuals, and records of the dates of installation; or provide and maintain certification of such information if an owner or operator no longer possesses an owner's manual or installation records. Required performance tests
must also be maintained for the lifetime of each cleaning machine, as applicable. The Agency does not consider the retention of these items a burden since no work is required other than placing them in an accessible file.

5(f) Confidentiality

(i) Confidentiality. All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B--Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 8, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

5(g)Sensitive Questions

This section is not applicable because the NESHAP for halogenated solvent cleaning machines does not involve matters of a sensitive nature.

6. Estimating the Burden and Cost of the Collection

6(a) Estimating Respondent Burden

The annual burden estimates for reporting and recordkeeping requirements are presented in Table 2 for batch vapor and in-line cleaning machines and in Table 3 for batch cold cleaning

machines. Table 4 is an aggregate burden table that compiles the burden totals from Tables 2 and 3. These numbers were derived from estimates based on the EPA's experience with other standards, and
from discussions with the industry representatives listed in Table 1. These costs represent the average burden that will be incurred by industry over a three year period.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

The information collection activities and total costs for facilities subject to the standard are also presented in Tables 2 and 3. It is assumed that there are an average of 2.6 batch vapor and/or in-line solvent cleaning machines per respondent. It is assumed that there is one batch cold solvent cleaning machine per respondent. EPA estimates an average annual respondent hourly cost of $56.63 ($26.97 + 110% overhead) for managerial staff and $35.89 for technical staff ($18.94 + 110% overhead). These labor rates were obtained from the United States Department of Commerce Bureau of Labor Statistics, March 1998, Table 2: Employment Costs for Civilian Workers by Occupational and Industry Group.

(ii) Estimating Capital and Operations and Maintenance Costs

The total capital cost for facilities with batch vapor and/or in-line solvent cleaning machines to achieve compliance with the standard is estimated to be $17,000 (assumes 2.6 cleaning machines per facility). Although the rule was promulgated in December 1994, affected existing sources were not required to comply with the standard until December 1997. Therefore, it is assumed that all existing sources will spend the estimated $17,000 to achieve compliance with the standard. The

annualized capital/startup cost is estimated to be $2,609. The annual operations and maintenance cost associated with the standard for owners or operators of batch vapor or in-line solvent cleaning machines is estimated to be $858. The total annualized cost requested per facility is $3,467. ($2609 capital and $858 Operations and Maintenance (O&M)), for a total annual capital O&M cost of $4,091,060 for 1189 facilities. Due to the minimal reporting and record keeping requirements for batch cold solvent cleaning machines, capital and operations and maintenance costs will not be incurred. EPA developed these cost estimates through direct consultation with industries and consultants to industry affected by the requirements.

(iii) Annualizing Capital Costs

The annualized stream of payments that an owner or operator of a batch vapor or in-line solvent cleaning machine would have to make over a nine-year period is computed as follows:

$$PVFA^{1} = SUM \{1/(1.07)^{t}\}, \text{where } t = 1 \text{ to } 8 \text{ years}$$

$$PVFA = 6.515$$

$$ANPV^{2} = \$17,000/6.515$$

$$ANPV = \$2,609/\text{year}$$

6(c) Estimating Agency Burden and Cost

Because reporting and recordkeeping requirements on the part of respondents are required under section 112 of the Act, no operational costs will be incurred by the Federal government. Examination of records to be maintained by the respondents will occur incidentally as a part of the periodic inspection and compliance assistance outreach to sources that is part of the EPA's overall compliance and enforcement program and is not

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[1] PVFA is the present value factor.

[2] ANPV is the annualized net present value.

attributable to this ICR. The only costs that the Federal government will incur are costs associated with the review of reported information, as presented in Table 5. Labor rates are as follows: technical at $39.77 and management at $56.63.

6(d) Estimating the Respondent Universe and Total Burden and Costs

EPA estimates that the subject universe includes 3,069 vapor or in-line halogenated solvent cleaning machines and 752 batch cold cleaning machines. The total number of owners or operators with batch vapor or in-line solvent cleaning machines subject to the standards is estimated to be 1180 (2.6 cleaning machines per facility.) The total number of owners or operators with batch cold cleaning machines is estimated to be 752 (1 cleaning machine per facility.) The universe was determined based on the submittal of initial notification reports as required in §63.468(a). As presented in Tables 2, 3, and 4, the total burden and cost for owners and operators of vapor or in-line halogenated solvent cleaning machines is 45,207 hours and $5,887,968.50.

6(e) Bottom Line Burden Hours and Costs/Master Tables

(i) The respondent tally. The bottom line respondent burden hours and costs, presented in Tables 2, 3, and 4, are calculated by summing the person-hours column and by summing the cost column. For the batch vapor and in-line cleaning machine subcategories as a whole, the annual burden and costs averaged over the first three years are 44,956.20 hours and $1,787,900.10 in labor costs.

(ii) The Agency tally. The bottom line Agency burden hours and costs, which are presented in Table 5, are calculated as in the respondent table. The annual number of hours averaged over

the first three years is 4,636.52 at a cost of $182,138.61 per year.

(iii) Variations in the annual bottom line. In this ICR, the one-time burden and costs associated with the initial report for applicability determination, initial statement of compliance, and performance tests were averaged over a 3-year period.

6(f) Reason for Change in Burden

There are no changes in burden because we do not anticipate any new sources within the next three years.

6(g) Burden Statement

Table 2 presents the average annual respondent burden for each owner or operator of a batch vapor or in-line solvent cleaning machine. Table 3 presents the average annual respondent burden for each owner or operator of a batch cold cleaning machine. Table 4 compiles the burden totals from Tables 2 and 3. Estimate include time for preparing and submitting notices, preparing and submitting performance test results, reporting exceedances, and monitoring and recording solvent consumption.

Burden means the total time, effort, or financial resources expended by person to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instruction; develop , acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintain information, and disclosing and providing information' adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources;

complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or

sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategy Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460-0001; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Include the EPA ICR No. 1652.04 and OMB Control No. 2060-0273 in any correspondence.